

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION**

**In Re:  
Remnant Oil Company, LLC**

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§  
§  
§

**Case No. 19-70106-SMR**

**Debtor(s)**

**Chapter 7**

**SECOND AND FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES OF ACCOUNTANT FOR TRUSTEE**

**This pleading requests relief that may be adverse to your interests.**

**If no timely response is filed with 21 days from the date of service, the relief requested herein may be granted without a hearing being held.**

**A timely response is necessary for a hearing to be held. Any response must be timely filed with the United States Bankruptcy Clerk, Western District of Texas, 903 San Jacinto Blvd., Suite 322, Austin, Texas 78701. If a timely response is filed, the Court will then set a hearing on the Motion, and you will be provided with notice of the date, time, and place of the hearing. If you do not attend the hearing, the Court may decide that you do not oppose the Motion.**

John Mosley, accountant for Ronald E. Ingalls, Trustee, files this Second and Final Application for Allowance of Compensation and Reimbursement of Expenses of Accountant for Trustee, and would show the Court as follows:

1. This Application is made pursuant to §330 of the Bankruptcy Code. This case was filed under Chapter 11 on July 16, 2019, converted to Chapter 7 on April 14, 2020, and reopened on July 22, 2025. On July 1, 2020, an order of the court, docket #453, was entered allowing the Trustee, Ronald E. Ingalls, to employ John Mosley as his duly appointed accountant in this case.

2. From July 22, 2025 through September 19, 2025, inclusive, the accountant has incurred fees for professional services rendered totaling \$1,000.00 and expenses of \$103.88.

3. There has been one prior application for fees and expenses in this case which was allowed on November 27, 2023, by Order Allowing Application for Compensation and Reimbursement of Expenses for Accountant Doc. No. 539 in the amount of \$4,201.62 as to the Debtor and \$3,759.17 as to Case No. 19-70107 Remnant Oil Operating, LLC (jointly administered under this Case No. 19-70106-SMR) for the time period covered July 1, 2020 through October 31, 2023. No retainer was received by the Accountant. Any compensation to be received will not be shared and no agreement or understanding exists between Accountant, or any other entity, for the sharing of compensation to be received for services rendered in connection with this case.

4. Time and Labor Required. The total award sought of \$1,000.00, represents 5.0 hours.

<u>Event</u>	<u>Estimated Fee</u>
Accountant advised Trustee regarding tax matters; prepared federal income tax return for the year 2025 and final Texas Franchise Tax Report	\$ 760.00
Preparation of Fee Application and supporting documents	\$ 240.00
TOTAL FEE	\$ 1,000.00

5. Novelty and Difficulty of Questions. This case was neither novel nor difficult.
6. Skill Requisite to Perform Legal Services Properly. Skill and experience in the field of tax law and accounting was required.
7. Preclusion of Other Employment Due to the Case. If the Accountant had not been representing the Trustee in this case, he would have been able to expend a like number of hours representing other clients; therefore, certain other employment was precluded from representation in this case.
8. Customary Fee. Applicant seeks approval of fees of John Mosley of \$200.00 per hour. The rates charged are the normal charges for work for clients for a case of this magnitude. The fees are usual and customary in the Western District of Texas with some variation. These are customary charges by Accountant and other certified public accountants in the area.
9. Whether Fee is Fixed or Contingent. Accountant has worked on an hourly basis.
10. Time Limitations Imposed by Client and Other Circumstances. The tax return was due in accordance with Title 26 of the United States Code. Accountant had to prepare the return by obtaining information from the Trustee.
11. Amount of Money and Property Involved and Result Obtained. The tax return was necessary to the estate, because the liability (or lack thereof) to the IRS has to be determined by the filing of returns before the funds available to unsecured creditors may be known.
12. Experience, Reputation and Abilities of Accountants. Accountant enjoys a good reputation in the community. The Accountant has significant experience and is a licensed Certified Public Accountant in the State of Texas.
13. Undesirability of Case. This case has not been undesirable.
14. Nature and Length of Professional Relationship of Client. Accountant had no prior relationship with the Debtor prior to being hired in this case. The Accountant has prior relationships with Trustee on other bankrupt estates and legal matters.
15. Awards in Similar Cases. The applicant submits that the compensation sought herein is not inconsistent with that awarded in other cases of a similar nature throughout the Western District of Texas and in the Austin area generally.

WHEREFORE, PREMISES CONSIDERED, John Mosley, accountant for Trustee, prays that the Court enter an order allowing compensation and expenses of \$1,103.88 for John Mosley from July 22, 2025 through September 19, 2025, inclusive, and that Ronald E. Ingalls, Trustee, be authorized to pay such compensation, and for such other relief as may be just and equitable.

Respectfully submitted,

/s/ John Mosley

John Mosley  
3834 Spicewood Springs Road, Suite 202  
Austin, Texas 78759  
Telephone: 512-327-7777  
Facsimile: 512-852-4777  
ACCOUNTANT FOR TRUSTEE

CERTIFICATE OF SERVICE

By my signature above, I hereby certify that on this September 19, 2025, a true and correct copy of the above and foregoing Application, the Fee Application Summary, and Compensation and Expense Support Exhibit were served by the CM/ECF system or first class, U.S. mail, to U. S. Trustee, P.O. Box 1539, San Antonio, Texas 78295-1539, Ronald E. Ingalls, P.O. Box 2867, Fredericksburg, Texas 78624-1927, and Debtor(s)' attorney, Bernard R. Given II, Loeb & Loeb LLP, 10100 Santa Monica Blvd, Ste. 2200, Los Angeles, CA 90067, and that the Fee Application Summary has been sent to all creditors listed on the attached exhibit by first class, U. S. mail.



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WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION**

**In Re:  
Remnant Oil Company, LLC**

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**Case No. 19-70106-SMR**

**Debtor(s)**

**Chapter 7**

**FEE SUMMARY**

**This pleading requests relief that may be adverse to your interests.**

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I. CLIENT: Trustee: Ronald E. Ingalls

II. REQUESTING APPLICANT/FIRM: John Mosley

III. TOTAL AMOUNT OF FEES REQUESTED:

a.	Fees:	\$1,000.00
b.	Expenses:	\$103.88
c.	Pre-petition retainer, if any:	None
d.	Time period covered:	July 22, 2025 through September 19, 2025

IV. BREAKOUT OF CURRENT APPLICATION:

<u>NAME/CAPACITY</u>	<u>TOTAL HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
<b>FEES:</b>			
Mosley CPA	5.0	\$200.00	\$ 1,000.00

<b>EXPENSES:</b>	Copies	\$ 26.50
	Postage	<u>\$ 77.38</u>
<b>TOTAL EXPENSES:</b>		\$103.88

**AMOUNT ALLOCATED FOR PREPARATION OF THE FEE APPLICATION: \$240.00**

V. PRIOR APPLICATIONS: There has been one prior application for fees and expenses in this case which was allowed on November 27, 2023, by Order Allowing Application for Compensation and Reimbursement of Expenses for Accountant Doc. No. 539 in the amount of \$4,201.62 as to the Debtor and \$3,759.17 as to Case No. 19-70107 Remnant Oil Operating, LLC (jointly administered under this Case No. 19-70106-SMR) for the time period covered July 1, 2020 through October 31, 2023

VI. OTHER CO-EQUAL OR ADMINISTRATIVE CLAIMANTS IN THIS CASE:

<u>NAME</u>	<u>PARTY REPRESENTED</u>
Ronald E. Ingalls	Trustee

VII. RESULTS OBTAINED: Accountant advised Trustee regarding tax matters; prepared federal income tax return for the year 2025 and final Texas Franchise Tax Report; and prepared fee application and supporting documents.

/s/ John Mosley  
John Mosley  
SBN: 14581640  
3834 Spicewood Springs Road, Suite 202  
Austin, Texas 78759  
Telephone: 512-327-7777  
Facsimile: 512-852-4777

**REMNANT OIL OPERATING CO,  
LLC**

**LIMITED MATRIX**

**19-70106-TMD**

3-2-1 Partners, Ltd.  
1192 E Draper Pkwy Ste 575  
Draper, UT 84020

Alliance Well Service LLC  
3803 Lynette Drive  
Amarillo, TX 79109

Arena Energy Llc  
9711 N Plainfield Dr  
Hobbs, NM 88242-0783

Arts Hot Oil Svc Llc  
Arturo R Carrasco Principal  
PO Box 188  
Lovington, NM 88260-0188

Baker Hughes Inc  
Will Marsh Chief Legal Officer  
PO Box 301057  
Dallas, TX 75303-1057

Baker Hughes Inc  
c/o J Blake Hamm  
Snow Spence Green LLP  
2929 Allen Pkwy Ste 2800  
Houston TX 77019

Baker Petrolite LLC  
c/o J Blake Hamm  
Snow Spence Green LLP  
2929 Allen Pkwy Ste 2800  
Houston TX 77019

Baker Petrolite Llc  
12645 W Airport Blvd  
Sugar Land, TX 77478-6120

Barron & Newburger, P.C.  
Stephen W. Sather  
7320 N Mopac Expwy Ste 400  
Austin TX 78731

Ben's Oilfield Services LLC  
c/o Traci D Siebenlist  
Crenshaw Dupree & Milam LLP  
PO Box 64479  
Lubbock TX 79464-4479

Ben's Oilfield Services, LLC  
Attn: Jennifer Grassham  
2701 N Acoma  
Hobbs, NM 88240-1801

Ben's Oilfield Svc Llc  
PO Box 2364  
Hobbs, NM 88241-2364

Bens Oilfield Services  
4411 98th Street Ste 400  
Lubbock, TX 79424-5062

Bernard R. Given II  
Loeb & Loeb LLP  
10100 Santa Monica Blvd Ste 2200  
Los Angeles, CA 90067-4120

Blue Cross Blue Shield of Texas  
c/o Kelly E Kleist  
Scheef & Stone LLP  
2600 Network Blvd Ste 400  
Frisco, TX 75034-6010

Bo Monk Pipe Testing Co Inc  
PO Box 1767  
Hobbs, NM 88241-1767

Bridge Capital Corporation  
c/o Erich Munding  
2365 Rice Blvd Ste 201  
Houston, TX 77005-2668

Brunson Chandler & Jones, PLLC  
175 S. Main Street Ste 1410  
Salt Lake City, UT 84111-1937

Cargill Inc Risk Management  
Attn: Tyler Smith  
825 Town & Country Ln Ste 1430  
Houston, TX 77024-2329

Cargill, Inc.  
c/o Winstead PC  
Attn: Sean B. Davis  
600 Travis Street Ste 5200  
Houston, TX 77002-3017

Carrie M McCaleb  
2103 Bullock Ave  
Artesia NM 88210-2238

Central Valley Electric Coop Inc  
c/o Randall L Rouse  
Lynch Chappell & Alsup  
300 N Marienfeld Ste 700  
Midland TX 79701-4393

Central Valley Electric Cooperative Inc  
PO Box 230  
Artesia, NM 88211-0230

Cibolo Energy Resources LLC  
c/o Joseph D Martinec  
Martinec Winn & Vickers PC  
223 Greystone Lane Unit B  
Cedar Creek, TX 78612

Cibolo Energy Resources, LLC  
c/o Harold N May  
1500 S Dairy Ashford #325  
Houston TX 77077-3861

Coats Pump And Supply Inc  
PO Box 1210  
Dexter, NM 88230-1210

Colorado Waterston, LLC  
c/o Adam Blum  
777 Main Street Ste 700  
Fort Worth TX 76102-5340

Colorado Waterston, LLC  
c/o Eric A Soderlund  
Ross & Smith PC  
700 N Pearl St Ste 1610  
Dallas TX 75201

Ct Corp  
PO Box 4349  
Carol Stream, IL 60197-4349

Donlin Recano & Company Inc  
6201 15th Avenue  
Brooklyn NY 11219

DXP Enterprises, Inc.  
c/o Michael W. Bishop  
Gray Reed & McGraw Law Firm  
1601 Elm Street Ste 4600  
Dallas TX 75201

ETC Texas Pipeline LTD  
1300 Main Street  
Houston TX 77002

First Capital Bank Of Texas  
310 W Wall Street Ste 100  
Midland, TX 79701-5129

FirstCapital Bank of Texas, N.A.  
c/o John Massouh  
Sprouse Shrader Smith PLLC  
PO Box 15008  
Amarillo TX 79105-5008

G And P Automation And Electric Llc  
PO Box 3766  
Hobbs, NM 88241-3766

Gandy Marley Inc  
PO Box 1658  
Roswell, NM 88202-1658

Internal Revenue Service  
Stop 5026 AUS  
300 E 8th Street  
Austin TX 78701-3233

INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Klx Energy Svcs Llc  
Product Line Manager  
3040 Post Oak Blvd 15th FL  
Houston, TX 77056-6582

Kodiak Gas Services, LLC  
c/o Kyle Boudousquie  
15320 Hwy 105 W Ste 210  
Montgomery TX 77356-2602

Kodiak Gas Services, LLC  
c/o John Thomas Oldham  
Okin Adams LLP  
1113 Vine Street Ste 240  
Houston, TX 77002-1044

Kodiak Gas Services, LLC  
c/o Christopher Adams  
Okin Adams LLP  
1113 Vine Street Ste 240  
Houston, TX 77002-1044

Kodiak Gas Services, LLC  
c/o Matthew S. Okin  
Okin Adams LLP  
1113 Vine Street Ste 240  
Houston, TX 77002

Kodiak Gas Svc Llc  
PO Box 732235  
Dallas, TX 75373-2235

L and E Services Llc  
PO Box 70  
Loco Hills, NM 88255-0070

Lea County Clerk  
100 N Main Ave Ste 1C  
Lovington, NM 88260-4000

Lea County Electric Cooperative Inc  
PO Box 1447  
Lovington, NM 88260-1447

Lexon Insurance Co  
12890 Lebanon Rd  
Mt Juliet, TN 37122-2870

Lexon Insurance Company  
c/o Locke Lord LLP  
Attn: W Steven Bryant  
600 Congress Ave Ste 2200  
Austin TX 78701-3055

Lucid Artesia  
3100 McKinnon Street Ste 800  
Dallas TX 75201

Martindale Consultants Inc  
4242 N Meridian Ave  
Oklahoma City OK 73112-2457

Mesa Well Servicing Lp  
PO Box 1620  
Hobbs, NM 88241-1620

Mesa Well Servicing, LP  
c/o Dore' Rothberg McKay, P.C.  
17171 Park Row Ste 160  
Houston, TX 77084-4927

Midland CAD  
c/o Tara LeDay  
PO Box 1269  
Round Rock, TX 78680-1269

Midland Central Appraisal District  
PO Box 908002  
Midland, TX 79708-0002

Midland County  
c/o Laura J Monroe  
Perdue Brandon Fielder Collins & Mott  
PO Box 817  
Lubbock TX 79408-0817

Modrall Sperling Law Firm  
c/o Spencer L. Edelman  
PO Box 2168  
1530 Rancho Guadalupe Trl NW  
Albuquerque, NM 87107-3382



Motley Services LLC  
KLX Energy Services LLC  
c/o Bernice Lee  
Kozyak Tropin Trockmorton  
2525 Ponce de Leon Blvd 9th FL  
Miami FL 33134

Zimmerman Oil Inc  
Zac Zimmerman President  
PO Box 397  
Lovington, NM 88260-0397

New Mexico Attorney General  
Hector Balderas  
408 Glisteo Street Villagra Bldg  
Santa Fe, NM 87501-2645

New Mexico Dept Of Labor  
Secretary  
PO Box 1928  
Albuquerque, NM 87103-1928

New Mexico Environment Dept  
1190 St Francis Drive Ste N4050  
PO Box 5469  
Santa Fe, NM 87505-4173

New Mexico Occupational Health And  
Safety Bureau Ohsb  
525 Camino De Los Marquez Ste 3  
Santa Fe, NM 87505-1816

New Mexico Oil Conservation Division et al  
c/o James C Jacobsen  
New Mexico Atty General's Office  
201 Third Street NW Ste 300  
Albuquerque NM 87102-3366

New Mexico SOS  
Maggie Toulouse Oliver  
New Mexico State Capitol Annex North  
325 Don Gaspar Ste 300  
Santa Fe, NM 87501-4401

New Mexico State Land Office  
310 Old Sante Fe Trl  
Sante Fe, NM 87501-2708

New Mexico Tax And Revenue Dept  
Legal Services Bureau  
1100 South St Francis Drive  
Santa Fe, NM 87505-4147

New Mexico Tax And Revenue Dept  
1100 South St Francis Drive  
Santa Fe, NM 87505-4147

New Mexico Tax And Revenue Dept  
PO Box 630  
Santa Fe, NM 87504-0630

New Mexico Taxation & Revenue Dept  
PO Box 25127  
Santa Fe, NM 87504-5127

New Mexico Taxation And Revenue  
Departme  
PO Box 2308  
Santa Fe, NM 87504-2308

New Mexico Taxation and Revenue  
Department  
Bankruptcy Section  
PO Box 8575  
Albuquerque, NM 87198-8575

Ono's Sandblasting And Painting Llc  
PO Box 3790  
Hobbs, NM 88241-3790

Patty Boatenhamer  
1604 W Ray  
Artesia NM 88210-2211

PCS Ferguson Inc  
c/o Dore' Rothberg McKay, P.C.  
17171 Park Row Ste 160  
Houston, TX 77084-4927

Perk Roc Inc  
dba Stevenson-Roach  
PO Box 157  
Artesia, NM 88211-0157

Permian Controls LLC  
6841 Virginia Pkwy Ste 103  
McKinney, TX 75071-5716

Reliable Well Svc Inc  
David Barrett President  
512 W Texas  
Artesia, NM 88210-2083

Remnant Oil Operating, LLC  
PO Box 397  
Lovington, NM 88260-0397

Rendall Sikes PLLC  
5310 Harvest Hill Rd Ste 260  
Dallas, TX 75230-5811

Ronald E Ingalls  
Chapter 7 Trustee  
PO Box 2867  
Fredericksburg, TX 78624-1927

Rose Alice Johnson  
405 E Hermosa Drive  
Roswell NM 88201-6536

Russell K Hall And Associates Inc  
PO Box 80925  
Midland, TX 79708-0925

Schleicher County  
c/o Laura J. Monroe  
Perdue, Brandon, Fielder, Collins & Mott  
PO Box 817  
Lubbock, TX 79408-0817

Schleicher County Appraisal District  
c/o Laura J. Monroe  
Perdue, Brandon, Fielder, Collins & Mott  
PO Box 817  
Lubbock, TX 79408-0817

Schleicher County Clerk  
PO Box 580  
2 South Divide Courthouse Square  
Eldorado, TX 76936-0580

Schleicher County Tax Assor/collector  
PO Box 658  
Eldorado, TX 76936-0658

Service Compression LLC  
301 Cummings Avenue  
Pocola OK 74902-3612

Shannon Tulk  
2205 W Brisce Ave  
Artesia, NM 88210-3006

Smith Manus  
2307 River Road Ste 200  
Louisville KY 40206-5005

Standard E&S, LLC  
PO Box 2724  
Lubbock, TX 79408-2724

Standard Energy Svc  
Pieter Bergstein President  
PO Box 2724  
Lubbock, TX 79408-2724

Strategy Oilfield Services, Inc.  
204 N Walnut Street  
Muenster, TX 76252-2766

Texas Workforce Commission  
Attn: Rick Diaz, BK Unit  
101 E 15th Street Rm 556  
Austin TX 78778-0001

Texas Workforce Commission  
Regulatory Integrity Division - SAU  
OAG Bankruptcy - Collect Div MC 008  
PO Box 12548  
Austin TX 78711-2548

The Supply Store Inc  
132445 Lovington Hwy  
Loco Hills, NM 88255

TRC Master Fund LLC  
PO Box 633  
Woodmere, NY 11598-0633

Twin Stars Compression LLC  
Roger Armstrong President  
100 Iowa Ave  
Bloomfield, NM 87413-5390

TX Comp of Public Accounts  
Revenue Accting Div - BK Section  
PO Box 13528  
Austin TX 78711-3528

TX Comp of Public Accts c/o OAG  
BK - Colls Div MC-008  
PO Box 12548  
Austin TX 78711-2548

United States Attorney  
Civil Process Clerk-IRS  
601 N W Loop 410 Ste 600  
San Antonio, TX 78216-5597

United States Attorney General  
Dept Of Justice  
950 Pennsylvania Ave NW  
Washington, DC 20530-0009

United States Trustee - MD12  
US Trustee's Office  
903 San Jacinto Blvd Ste 230  
Austin TX 78701-2450

WILDCAT OIL TOOLS  
706 N COLORADO  
MIDLAND TX 79701-3437

Will Gray  
PO Box 5375  
Midland TX 79704

WILLIAM K. WARREN  
FOUNDATION  
PO Box 470372  
Tulsa, OK 74147-0372

Xcel Energy  
PO Box 9477  
Minneapolis, NM 55484-9477